REMARKS

In response to the Examiner's Office Action, claims 1, 41 and 54 have been amended and claim 55 has been canceled. It is believed that the claims as now presented define over the prior art made of record and re-examination of this application is respectfully requested. .

The claimed invention relates to mobility management in a wireless communication network. The network comprises a packet control function (PCF), a plurality of access network controllers (ANC) that connect an access terminal (AT) to the PCF, and a session controller (SC). The SC stores session information used by the ANCs to connect the ATs to the PCF. Thus, the SC provides AT mobility management at the subnet granularity by handling mobility management tasks typically handled by PCFs in conventional networks. The claimed arrangement eliminates the need to involve the PCF in the handoff of dormant ATs between ANCs within the same subnet, and allows a single subnet to span multiple ANCs.

One of the functions preformed by the session controller is redirecting service requests received by a first access network controller from a packet control function to a second access network controller. This function is recited in each of the independent claims. The redirection function is present in the claimed invention because the PCF and SC are different logical entities. Those skilled in the art will appreciate, however, that the PCF and SC could still be co-located in a single network node. The prior art does not teach or suggest a logically separate session controller for redirecting service requests as claimed.
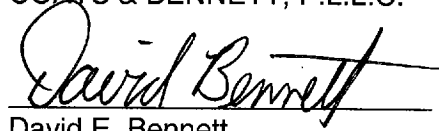
Lim, which is cited by the Examiner, discloses a system and method of controlling a packet data service in a mobile communications network. Lim teaches a Location Management Function (LMF) that that is co-located with a Mobile Switching Center (MSC) or PCF. Because the session controller is implemented in the PCF, it does not perform all of the functions of the claimed session controller. In particular, the LMF in Lim does not perform the function of redirecting service requests received by a first ANC from the PCF to a second ANC. That is

because the LMF is integrated into the function of the PCF. Moreover, because the LMF is

integrated with the PCF in Lim, the PCF in Lim is necessarily involved in signaling to transfer

session information, a problem that is avoided by the claimed invention.

Because Lim does not teach or suggest a SC that redirects service requests received by

a first ANC from a PCF to a second ANC, it is believed that each of the independent claims in

patentable over the prior art. Accordingly, Applicant respectfully requests the allowance of all

pending claims.

Respectfully submitted,

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